

Remarks:

Claims 1-10 are currently pending in the application. By this amendment, claims 1-10 are canceled without prejudice and new claims 14-25 have been added. It is respectfully submitted that no new matter is added to the application by these amendments. Reconsideration and reexamination is respectfully requested.

Claims 1-9 stand rejected under 35 U.S.C. 103 (a) as being unpatentable over U.S. Patent No. 2, 778,000 to Mills. The rejection is respectfully traversed.

Claims 1-9 have been cancelled without prejudice and therefore the rejection is moot. However, the rejection will be addressed with respect to new independent claim 14.

Mills discloses a hinge (12) which houses conductive elements that route electrical current from a refrigerator cabinet (10) to a refrigerator door (11). The hinge (12) comprises two portions, a hinge butt (13) and a hinge leaf (14), that are constructed from an electrical insulating material, rendering the hinge (12) incapable of conducting electricity. The hinge butt (13) and hinge leaf (14) mount to the cabinet (10) and door (11), respectively, by bolts (30, 35, 64, 68). Electrical current is routed through the hinge butt and leaf, from bolts (30, 35) of the hinge butt (13) to bolts (64, 68) of the hinge leaf (14), by electrically conductive elements coupled between the hinge butt bolts (30, 35) and hinge leaf bolts (64, 68). These electrically conductive elements include resilient members (74, 78), pins (55, 58), and conductors (67, 72) that extend through the hinge (12).

As claimed in claim 14, Applicants' invention relies upon the electrical conductivity of the first and second hinge portions to form part of the electrical connection device that conducts electricity from the first conductor associated with the cabinet and the second conductor associated with the door. In Mills, the hinge portions do not themselves conduct electricity. In fact, they cannot as they are made from electrically insulating material. Instead, Mills uses a conductor that is internal to the hinge portions to route electrical current. Therefore, Mills does not disclose the claimed electrically conductive hinge portions as called for by claim 14.

Therefore, the manner in which Applicants' invention of claim 14 conducts electrical power from the cabinet to the door is entirely different than Mills. Applicants' invention uses the hinge portions as the electrical conductors whereas Mills uses an electrical conductor routed through the hinge portions. Applicants' invention negates the need to make the hinge elements

out of electrically insulating materials like Mills and negates the need to find a way to route a conductor through the hinge portions. As such, Applicants' invention results in a much smaller and easier to make hinge structure unlike Mills.

In fact, Mills teaches away from Applicants' invention in that Mills teaches that the hinge portions must be made of electrically insulating material. Therefore, it would not have been obvious to one of ordinary skill in the art to modify the hinge taught by Mills to be electrically conductive as is shown by the Applicants' invention since Mills specifically teaches away from such a hinge.

Claims 15-25 are also patentable over Mills based on their direct or indirect dependency on claim 14.

Claim 10 stands rejected under 35 U.S.C. 103 (a) as being unpatentable over Mills in view of U.S. Patent No. 3,089,202 to Pulaski. The rejection is respectfully traversed.

Claim 10 has been cancelled without prejudice and therefore the rejection is moot.

It is respectfully submitted that all of the claims in the application are allowable over the prior art of record. Early notification of allowability is respectfully requested.

If there are any questions regarding this matter, please contact the undersigned attorney.

Respectfully submitted,

Marco Stura et al.

Dated: January 20, 2006

By: /Mark A. Davis/
Mark A. Davis, Reg. No. 37,118
McGARRY BAIR PC
171 Monroe Avenue, NW, Suite 600
Grand Rapids, Michigan 49503
616-742-3500

G0204759.DOC